



U.S. Department of Justice

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March 17, 2017

Honorable Marvin J. Garbis
United States District Judge
United States Courthouse
101 West Lombard Street
Baltimore, Maryland 21201

In re: United States v. Harold Martin, MJG-17-0069

Dear Judge Garbis:

As Your Honor requested, the government is providing for the Court's review the same documents that have been made available to defense counsel, and which remain available to counsel, for review on a read-and-return basis. These twenty documents underlie the charges in the Indictment.

As the Court will observe, and as mentioned during the Classified Information Procedures Act (CIPA) Section 2 conference on Monday, some information upon which the government does intend to rely at trial has been redacted from these versions of the documents. The same information was redacted from the versions shown to defense counsel.

The government respectfully requests that you review these documents in a Secure Compartmented Information Facility (SCIF) supervised by the Classified Information Security Officer (CISO). The government further respectfully requests that Your Honor not store these documents in the court's SCIF, but instead that Your Honor return the documents to the CISO when your review is complete. The CISO will return the documents to the federal agency representatives responsible for the documents, who will retain them in the event that the Court or counsel wishes to review them again.

After the entry of a protective order under Section 3 of CIPA, the government will provide to defense counsel copies of the twenty documents that have been cleared by the responsible agencies for the purpose of discovery pursuant to the CIPA protective order issued by the Court. It is possible that additional information, upon which the government would not rely at trial, will be redacted from those versions. At the Court's request, the government will, of course, provide copies of those documents for retention in the Court's SCIF.

Very truly yours,

Rod J. Rosenstein
United States Attorney

/s/

Harvey E. Eisenberg
Assistant U. S. Attorney
Chief, National Security Section

/ss/

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/s/

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cc: All counsel of record, via ECF
Classified Information Security Officer